

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TEXASLDPC INC.,

Plaintiff,

v.

BROADCOM INC., LSI CORPORATION,
AVAGO TECHNOLOGIES U.S. INC.,

Defendants.

C.A. No. 18-1966-SB

JURY TRIAL DEMANDED

**PLAINTIFF'S TEXASLDPC INC.'S NOTICE OF
30(B)(6) DEPOSITION OF DEFENDANTS (TOPICS 1-3)**

Pursuant to Federal Rules of Civil Procedure 30(b)(6), Plaintiff TexasLDPC Inc. ("TexasLDPC") hereby gives notice that it will take the deposition of Defendants Broadcom Inc., LSI Corporation, Avago Technologies U.S. Inc. ("Defendants") representative(s) for each of the Topics of Examination ("Topics") identified in the attached Exhibit A. The scope of the deposition includes knowledge and information in the possession, custody, or control of Defendants' officers, directors, employees, representatives, subsidiaries, and/or affiliates. The deposition will take place on Thursday, November 18, 2021, beginning at 9:00 a.m. PST (or at such other date and time as the parties agree), at the offices of Fish & Richardson P.C., located at 500 Arguello Street, Suite 400, Redwood City, CA 94063 (or at such other location and time as counsel for the parties may agree). The deposition will continue day-to-day as necessary until the time period allowed by the Federal Rules of Civil Procedure has expired. The depositions will be recorded stenographically and videographically, and the stenographic method will include the instant visual display of testimony.

Defendants are requested to provide TexasLDPC with written notice, not later than November 4, 2021, of the name and title of each corporate representative and the Topics on which that witness will testify.

Dated: October 21, 2021

FISH & RICHARDSON P.C.

Of Counsel:

Lawrence K. Kolodney
Fish & Richardson P.C.
One Marina Park Drive
Boston, MA 02210
(617) 542-5070
kolodney@fr.com

/s/ Warren K. Mabey, Jr.
Gregory R. Booker (#4784)
Warren K. Mabey, Jr. (#5775)
222 Delaware Avenue, 17th Floor
P.O. Box 1114
Wilmington, DE 19899
(302) 652-5070
booker@fr.com
mabey@fr.com

David M. Hoffman
Fish & Richardson P.C.
111 Congress Avenue, Suite 810
Austin, TX 78701
(512) 472-5070
hoffman@fr.com

ATTORNEYS FOR PLAINTIFF
TEXASLDPC INC.

EXHIBIT A

DEFINITIONS

1. “You,” or “Your” means Broadcom Inc., LSI Corporation, Avago Technologies U.S. Inc., including past and present officers, directors, employees, agents, consultants, predecessors, subsidiaries, parents, affiliates, and contractors.

2. “Entity” means natural persons, law firms, partnerships, corporations, associations, and any other legal entities and divisions, departments, or other units thereof.

3. “LDPC Decoder Technology” means methods, circuit designs, semiconductor designs, hardware description files, or software embodying techniques, designs or simulations of Low Density Parity Check code decoders.

4. “Accused Product” means any device designed, developed, made, used, offered for sale, promoted, marketed, or sold by You using LDPC Decoder Technology that has been accused of infringement in this case, including at least all hard disk drive (HDD) controller ICs, chipsets, or kits with LDPC decoder, beginning with the McLaren family and all subsequently released controller ICs, chipsets, or kits, all solid state disk (SSD) controller ICs, chipsets, or kits with LDPC decoder, and all 802.11ac- and/or 802.11ad- or later 802.11 version compliant Wi-Fi products with LDPC decoder, as identified in TexasLDPC’s paragraph 4 disclosures. To be clear, Accused Products include any products meeting the definition above that were designed, developed, made, used, offered for sale, promoted, marketed, or sold by any entity listed in the definition of “You,” to include any products made or sold by any subsidiary of Broadcom, Avago, or LSI.

TOPICS FOR DEPOSITION

1. Your corporate structure and organization, including an identification of all entities involved with the design, development, manufacture, marketing, sale, or importation of products using LDPC Decoder Technology.

2. The role and responsibilities of each entity involved in the design, development, manufacture, marketing, sale, or importation into the United States of products using LDPC Decoder Technology.

3. Your practices and policies related to record keeping for the Accused Products, including for each of Your database or data management and retrieval systems—such as any enterprise resource planning (“ERP”) system, any centralized integrated enterprise system (“CIES”), any design win database, any purchase order database, and any sales database (including the Oracle Sales, Oracle CPQ, and Oracle DataFox systems described at <https://www.oracle.com/customers/broadcom/>)—that includes records or data related to the Accused Products, including the following areas:

- a. Your entities, subsidiaries, business units, and affiliates that utilize the system;
- b. The methods to access the system;
- c. What reports can be generated from the system;
- d. What reports You actually generate from the system;
- e. The individuals and entities with access to reports generated by the system and their reasons for access thereto; and
- f. What types of information related to the Accused Products is stored in or accessible via the system.